

UNITED STATES DISTRICT COURT  
FOR THE  
MIDDLE DISTRICT OF TENNESSEE

United States of America	)	
	)	
v.	)	Case No. 3-22-cr-00282
	)	
Glen Casada and Cade Cothren	)	
Defendants	)	

MEMORANDUM IN SUPPORT OF MOTION TO QUASH SUBPOENNA

William E. Young (Bill Young) received a subpoena to attend the trial in this case. As stated in Bill Young's Affidavit, he is a state official. He is Executive Director of the Tennessee Bureau of Ethics and Campaign Finance ("TBECF"). The subpoena was issued by Defendants' counsel. Significantly, no one from the offices of Defendants' counsel has contacted Director Young or otherwise attempted to determine his knowledge about the matters in this case. Director Young's Affidavit was submitted to Defendants' counsel and Director Young offered to talk with persons from the offices of Defendants' counsel, but no contact has been made by the Defendants' counsel.

Because Director Young has no information regarding the matters in this case, the subpoena places an undue burden upon him. Presumably, the Defendants' counsel issued the subpoena to him because they presumed he had some involvement with overseeing the operations of Phoenix Solutions. However, Defendants' counsel are mistaken in that regard. Neither TBECF nor Director Young had any involvement with Phoenix Solutions being approved as a mailer program vendor to provide constituent mail services to members of the Tennessee General Assembly. Neither TBECF nor Director Young conducted any investigation in the operations of Phoenix Solutions, and

neither TBECF nor Director Young is in possession of any information or documents related to the operations of Phoenix Solutions.

Because Director Young and TBECF are not in possession of any information or documents related to the matters before this Court, the subpoena presents an undue burden upon Director Young and in any event Director Young has no relevant information regarding the matter pending before this Court. For this reason, Director Young requests the Court to quash the subpoena issued to him.

Respectfully submitted,

HUBBARD & SMITH

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